

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA**

<b>MARTHA ADAMS, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	<b>CIVIL ACTION NO.</b>
	)	<b>2:07-CV-01064-WKW-TFM</b>
<b>vs.</b>	)	
	)	
<b>ASBESTOS DEFENDANTS:</b>	)	
	)	
<b>ALBANY INTERNATIONAL, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**DISCLOSURE STATEMENT OF DEFENDANT SQUARE D COMPANY  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 7.1(a)**

NOW COMES SQUARE D COMPANY ("SQUARE D") for itself and, to the extent necessary, on behalf of a purported party Defendant<sup>1</sup> incorrectly designated as "Schneider Electric Industries, S.A.S., North American Division" (a fictitious name that does not exist as an entity under the laws of any state or foreign jurisdiction), pursuant to Fed.R.Civ.P. 7.1, and to enable judges and magistrates of the Court to evaluate possible disqualification or recusal, the undersigned attorneys of record for the Defendant, SQUARE D COMPANY, certify that, based upon information and belief, the following is the ultimate parent company of SQUARE D COMPANY and has issued shares of securities to the public: Schneider Electric, SA, incorporated under the laws of France, and traded on the Paris Stock Exchange.

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<sup>1</sup>The summons for Square D was served on its registered agent in Wilmington, Delaware. Plaintiffs have also attempted to sue a purported defendant identified as "Schneider Electric Industries, S.A.S., North American Division" ("Schneider Electric") and the court has issued a summons for Schneider Electric which is to be served via certified mail at Square D's principal place of business in Palatine, Illinois. However, Schneider Electric is not a legal entity capable of being sued, inasmuch as Schneider Electric, among other things, is a brand name used by Square D Company. Nonetheless, Square D responds to this suit and the suit brought against the non-existent entity, Schneider Electric, pursuant to Rules 8 and 9 of the *Federal Rules of Civil Procedure*; however, to the extent that it may ultimately be determined that this position misapprehends the circumstances or is otherwise in error based on law or on fact, all Rule 12 defenses are hereby specifically reserved.

Respectfully submitted,

s/Edward B. McDonough, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of January, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record in this case.

s/Edward B. McDonough, Jr.

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Edward B. McDonough, Jr.